IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
:
v. : CR-07-124-04T
:
KAREN M. LYNCH :

GOVERNMENT'S SENTENCING MEMORANDUM

The government recommends a sentence of eight months imprisonment. In considering its sentencing recommendation, the government looks to the nature of the offense, the defendant's role in the offense, and the need for the sentence imposed.

This case involved a conspiracy to commit a bank fraud in excess of $80,000, $64,800 of which was attributable to the defendant, Karen M. Lynch, as relevant conduct. The victim bank's loss exceeds $69,000. Lynch admitted to receiving $7,000 for cashing five checks, which had a total value of $16,800. Additionally, there were counterfeit checks seized from Saffiyah Abdullah's house, where John Perras was staying, that were made payable to Lynch. This suggests that were it not for law enforcement, Lynch would have continued to cash fraudulent checks. Lynch's role may have been confined to that of check cashing, but she was well-compensated for her efforts and fully aware of the nature of the scheme.

Like Perras, Lynch was in this for some "quick cash." Lynch told Secret Service Agent Caroline O'Brien-Buster that she did not think cashing the checks was a "big deal." Lynch, like her co-defendants, viewed the check cashing scheme as an easy way to make money, far easier than maintaining legal employment. Lynch committed the bank fraud while on state bond for a domestic incident involving charges of robbery, assault, and vandalism. To commit one felony while on bond for another demonstrates a lack of respect for the law. Such behavior highlights Lynch's need for deterrence. A sentence of eight months imprisonment is needed to deter this defendant and others.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorneys,

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CERTIFICATE OF SERVICE

On March 14, 2008, I caused the within "Government's Sentencing Memorandum" to be filed electronically and it is available for viewing and downloading from the ECF system.

Electronic notification:

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